

Exhibit 14

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Renee Spence <spence@loevy.com>

Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

Renee Spence <spence@loevy.com>

Fri, Aug 30, 2024 at 10:50 AM

To: Haley Coolbaugh <Haley@bonjeanlaw.com>

Cc: Kevin Kirk <kckirk@obertsgalasso.com>, Austin Rahe <arahe@rfclaw.com>, Molly Boekeloo <MBoekeloo@borkanscahill.com>, "Maurice C. Hunt" <mhunt@jsotoslaw.com>, Andrew Grill <agrill@rfclaw.com>, "Catherine M. Barber" <cbarber@rfclaw.com>, "Eileen E. Rosen" <ERosen@rfclaw.com>, Jessica Zehner <jzehner@rfclaw.com>, Lauren Ferrise <lferrise@rfclaw.com>, "Theresa B. Carney" <tcarney@rfclaw.com>, Elva Lopez <elopez@rfclaw.com>, Kara Hutson <khutson@rfclaw.com>, Jim Sotos <JSotos@jsotoslaw.com>, "Josh M. Engquist" <JEngquist@jsotoslaw.com>, "Elizabeth R. Fleming" <efleming@jsotoslaw.com>, "Elise A. Lindsley" <elindsley@jsotoslaw.com>, Katelyn Salek <ksalek@jsotoslaw.com>, "Lauren E. Muhr" <LMuhr@jsotoslaw.com>, "Rachael L. H. Letten" <rletten@jsotoslaw.com>, Tonet Ballard <TBallard@jsotoslaw.com>, Valerie Stubbe <VStubbe@jsotoslaw.com>, Graham Miller <gmiller@borkanscahill.com>, Misha Itchhaporia <mitchhaporia@borkanscahill.com>, Steven Borkan <sborkan@borkanscahill.com>, Tim Scahill <tscahill@borkanscahill.com>, Whitney Hutchinson <whutchinson@borkanscahill.com>, Emily Schnidt <eschnidt@borkanscahill.com>, Elena Favela <elena@borkanscahill.com>, Liana Favela <kmercado@borkanscahill.com>, Wendy Chasteen <wendy@borkanscahill.com>, Kellie Voss <kellie@kmltldlaw.com>, Christiane Murray <cmurray@borkanscahill.com>, KELLI HUNTSMAN <kelli.huntsman@cookcountysao.org>, Bill Oberts <wboerts@obertsgalasso.com>, Ashley Cohen <ashley@bonjeanlaw.com>, Jennifer Bonjean <jennifer@bonjeanlaw.com>, Gabriella Orozco <Gabriella@bonjeanlaw.com>, Steve Art <Steve@loevy.com>, Anand Swaminathan <anand@loevy.com>, Alyssa Martinez <alyssa@loevy.com>, Nkemjika Emenike <emenike@loevy.com>, Marc Motter <motter@loevy.com>, Lily Dunkin <dunkin@loevy.com>, Andrea Checkai <ACheckai@borkanscahill.com>

Counsel,

I write to provide responses about certain issues that were discussed last week's August 22 meet and confer:

- **Third party civilian depositions** - The parties discussed moving forward with third party civilian depositions, but Defendants were unable to provide their position on which party would have priority when deposing Juan Parra, Ramon Torres, Fred Marrero, and Isidro Quinones. Defendants stated they needed the CCSAO files, which are likely to span more than 11,000 pages, to reach a decision. Defendants also stated they need the transcripts from Juan Parra's trial and his defense attorney's file. Those documents have been produced at Abrego 21383-21546 and Johnson Subp Response 1-328. Defendants also stated they require the CCSAO files to schedule depositions for A. Vasquez, M. Morra, M. Parra, and J. Pacheco. In sum, Defendants are unwilling to commit to deposing the noticed third party civilians at a time certain. Plaintiff disagrees with this stance and intends to move forward with depositions.
- **Third party officer depositions** - Plaintiff asked the City to agree to provide depositions for third party officers by August 27, no dates have been provided
- **Individual Defendants' depositions** - Plaintiff asked Defendants to provide dates in October for the Individual Defendants' depositions by August 29. No dates have been provided.
- **Contention Interrogatories** - Both parties served Rule 37.2 letters requesting supplementation to contention interrogatories. In Plaintiff's Rule 37.2 response, Plaintiff proposed that the parties agree to a date by which the parties would supplement responses. After considering Defendants' arguments about Plaintiff's responses to their interrogatories, Plaintiff has decided to withdraw this proposal. Per Defendants' request, Plaintiff will supplement his responses to Defendants' contention interrogatories to identify responsive documents. Plaintiff expects Defendants to do the same. Defendants have argued that Plaintiff has access to documentary evidence sufficient to answer these interrogatories, and it follows that since Defendants have the same access to the documents, Defendants can also supplement their responses. There is no reason why Plaintiff should be treated differently than Defendants. If Defendants refuse to supplement their responses, Plaintiff will seek the Court's intervention.
- **Plaintiff's Interrogatory No. 14** - Officer Defendants agreed to supplement their responses to Interrogatory 14 by August 29, no responses have been served.
- **Turano responses** - Turano agreed to provide her position on supplementing her responses to Plaintiff's First Set of Interrogatory No. 15, now that the Court has denied, in part, Turano's motion to dismiss. No position has been provided.

- **HIPAA documents and subpoenas** – Plaintiff has conducted a search for documents responsive to Defendants' request for medical records and he does not possess any responsive documents. To date, Plaintiff has not sought any medical or mental health treatment since his release and did not receive medical care from 1996-1999. As is reflected in Plaintiff's interrogatory response, Plaintiff received medical care while wrongfully imprisoned at the Illinois Department of Corrections. Plaintiff agrees to obtain those documents.
- **ESI and 404(b)** – The parties agree to resolve issues pertaining to 404(b) witnesses and ESI in global conversations across Guevara cases.
- **Guevara's Request to Produce Nos. 1-12, 15-21, 23-24, and 30-35** – Guevara asked Plaintiff to supplement his responses to specifically identify by Bates stamp documents responsive to the above-listed request. Guevara objected to Plaintiff's referring to his response to Request No. 1 which does reference documents by Bates stamp. Indeed, Plaintiff's responses are substantially similar to Defendant Officers' responses to Plaintiff's Requests to Produce. Plaintiff stands on his responses as they comport with the Rules and indicate whether or not Plaintiff has produced responsive documents. To the extent Guevara intends to move the Court to require Plaintiff to provide specific Bates stamp for each response, Plaintiff will ask the Court to impose the same requirement on the Defendant Officers.
- **Guevara's Request to Produce Nos. 13 and 14** – Plaintiff will supplement this response to provide income information from W-2s from 2023 to present.
- **Guevara's Request to Produce Nos. 26** – Guevara stated he will seek Plaintiff's phone logs.
- **City's outstanding document responses** - The City has still not produced documents pertaining to polygraph request and examinations during the Garcia homicide investigation, or maps, floor plans, and pictures of relevant areas of the CPD facilities. The City also has not completed its production of indices and relevant policies, or producing documents in the City's custody pertaining to listed third-party witnesses.
- **City's Responses to Plaintiff's First Set of Interrogatories Nos. 10, 11, 14** – Due to time constraints, Plaintiff was unable to confer with the City last week about supplementing its responses to the above-listed interrogatories. However, Plaintiff and the City have discussed the City's deficient responses at a prior meet and confer. Please advise by Tuesday, Sept 3 if we have reached an impasse so that Plaintiff can raise the issue with the Court.

Spence

R. Spence (She/Her)



Office: (312) 243-5900

311 N Aberdeen St, Chicago, IL 60607

www.loevy.com

On Fri, Aug 16, 2024 at 4:08 PM Renee Spence <spence@loevy.com> wrote:

Thanks, Haley.

Here is the conference call information for August 22, 2024 at 11am CT: 914-893-5622 PIN: 921 143 720#

Thanks,

R. Spence (She/Her)



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On Fri, Aug 16, 2024 at 4:04 PM Haley Coolbaugh <Haley@bonjeanlaw.com> wrote:

Hi Spence:

Yes, 11CST will work for us.

Sincerely,

Haley Coolbaugh

Bonjean Law Group, PLLC

PLEASE NOTE NEW ADDRESS:

303 Van Brunt Street, 1st Fl
Brooklyn, New York 11231

Tel: 718.875.1850

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From: Renee Spence <spence@loevy.com>

Date: Friday, August 16, 2024 at 3:54 PM

To: Kevin Kirk <kckirk@obertsgalasso.com>

Cc: Haley Coolbaugh <Haley@bonjeanlaw.com>, Austin Rahe <arahe@rfclaw.com>, Molly Boekeloo <MBoekeloo@borkanscahill.com>, Maurice C. Hunt <mhunt@jsotoslaw.com>, Andrew Grill <agrill@rfclaw.com>, Catherine M. Barber <cbarber@rfclaw.com>, Eileen E. Rosen <ERosen@rfclaw.com>, Jessica Zehner <jzehner@rfclaw.com>, Lauren Ferrise <lferrise@rfclaw.com>, Theresa B. Carney <tcarney@rfclaw.com>, Elva Lopez <elopez@rfclaw.com>, Kara Hutson <khutson@rfclaw.com>, Jim Sotos <JSotos@jsotoslaw.com>, Josh M. Engquist <JEngquist@jsotoslaw.com>, Elizabeth R. Fleming <efleming@jsotoslaw.com>, Elise A. Lindsley <elindsley@jsotoslaw.com>, Katelyn Salek <ksalek@jsotoslaw.com>, Lauren E. Muhr <LMuhr@jsotoslaw.com>, Rachael L. H. Letten <rletten@jsotoslaw.com>, Tonet Ballard <TBallard@jsotoslaw.com>, Valerie Stubbe <VStubbe@jsotoslaw.com>, Graham Miller <[gmiller@borkanscahill.com](mailto:gmilller@borkanscahill.com)>, Misha Itchhaporia <mitchhaporia@borkanscahill.com>, Steven Borkan <sborkan@borkanscahill.com>, Tim Scahill <tscahill@borkanscahill.com>, Whitney

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Subject: Re: Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

Thanks, Kevin. It seems like 8/22 at 11am CT works for almost everyone.

Haley, I know 8/22 was a difficult day for you, but can 11am CT work for you as well?

Spence

R. Spence (She/Her)

Image removed by sender.

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On Fri, Aug 16, 2024 at 2:21 PM Kevin Kirk <kckirk@obertsgalasso.com> wrote:

Hi Spence,

Sorry on the delay, I was waiting to hear back as to whether a number of scheduled deps were going next week.

Unfortunately, we are not available on 8/21. I am available on 8/22 from 10am to 1pm, and any time before noon on 8/23

Kevin C. Kirk

Associate



Oberts Galasso Law Group

161 N. Clark St. Suite 1600

Chicago, IL 60601

kckirk@obertsgalasso.com

PLEASE NOTE:

Service Per IL Sup Ct Rule 11

Is accepted at docket@obertsgalasso.com

From: Renee Spence <spence@loevy.com>

Sent: Friday, August 16, 2024 8:23 AM

To: Haley Coolbaugh <Haley@bonjeanlaw.com>

Cc: Austin Rahe <arahe@rfclaw.com>; Molly Boekeloo <MBoekeloo@borkanscahill.com>; Maurice C. Hunt <mhunt@jsotoslaw.com>; Andrew Grill <agrill@rfclaw.com>; Catherine M. Barber <cbarber@rfclaw.com>; Eileen E. Rosen <ERosen@rfclaw.com>; Jessica Zehner <jzehner@rfclaw.com>; Lauren Ferrise <lferrise@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Elva Lopez <elopez@rfclaw.com>; Kara Hutson <khutson@rfclaw.com>; Jim Sotos <JSotos@jsotoslaw.com>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Elizabeth R. Fleming <efleming@jsotoslaw.com>; Elise A. Lindsley <elindsley@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>; Lauren E. Muhr <LMuhr@jsotoslaw.com>; Rachael L. H. Letten <rletten@jsotoslaw.com>; Tonet Ballard <TBallard@jsotoslaw.com>; Valerie Stubbe <VStubbe@jsotoslaw.com>; Graham Miller <[gmiller@borkanscahill.com](mailto:gmillar@borkanscahill.com)>; Misha Itchhaporia <mitchhaporia@borkanscahill.com>; Steven Borkan <sborkan@borkanscahill.com>; Tim Scahill <tscahill@borkanscahill.com>; Whitney Hutchinson <whutchinson@borkanscahill.com>; Emily Schnidt <eschnidt@borkanscahill.com>; Elena Favela <elena@borkanscahill.com>; Liana Favela <kmercado@borkanscahill.com>; Wendy Chasteen <wendy@borkanscahill.com>; Kellie Voss <kellie@kmltldlaw.com>; Christiane Murray <cmurray@borkanscahill.com>; KELLI HUNTSMAN <kelli.huntsman@cookcountysao.org>; Bill Oberts <wboberts@obertsgalasso.com>; Kevin Kirk <kckirk@obertsgalasso.com>; Ashley Cohen <ashley@bonjeanlaw.com>; Jennifer Bonjean <jennifer@bonjeanlaw.com>; Gabriella Orozco <Gabriella@bonjeanlaw.com>; Steve Art <Steve@loevy.com>; Anand Swaminathan <anand@loevy.com>; Alyssa Martinez <alyssa@loevy.com>; Nkemjika Emenike <emenike@loevy.com>; Marc Motter <motter@loevy.com>; Lily Dunkin <dunkin@loevy.com>; Andrea Checkai <ACheckai@borkanscahill.com>

Subject: Re: Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

Hey Kevin and Bill,

Do any of these time slots work for you?

Spence

R. Spence (She/Her)

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On Thu, Aug 15, 2024 at 6:43 PM Haley Coolbaugh <Haley@bonjeanlaw.com> wrote:

For Plaintiff Cain, we're available 8/21 from 10:00-10:45AM CST or 2:00PM CST and after. 8/22 is a busier day for us but if need be I can try to find some availability.

Sincerely,

Haley Coolbaugh

Bonjean Law Group, PLLC

PLEASE NOTE NEW ADDRESS:

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From: Austin Rahe <arahe@rfclaw.com>
Date: Thursday, August 15, 2024 at 4:25 PM
To: Molly Boekeloo <MBoekeloo@borkanscahill.com>, Renee Spence <spence@loevy.com>, Maurice C. Hunt <mhunt@jsotoslaw.com>
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Subject: RE: Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

8/21 after 10 a.m. or 8/22 any time works for RFC

From: Molly Boekeloo <MBoekeloo@borkanscahill.com>
Sent: Thursday, August 15, 2024 2:17 PM
To: Renee Spence <spence@loevy.com>; Maurice C. Hunt <mhunt@jsotoslaw.com>
Cc: Andrew Grill <agrill@rfclaw.com>; Austin Rahe <arahe@rfclaw.com>; Catherine M. Barber <cbarber@rfclaw.com>; Eileen E. Rosen <ERosen@rfclaw.com>; Jessica Zehner <jzehner@rfclaw.com>; Lauren Ferrise <lferrise@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Elva Lopez <elopez@rfclaw.com>; Kara Hutson <khutson@rfclaw.com>; Jim Sotos <JSotos@jsotoslaw.com>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Elizabeth R. Fleming <efleming@jsotoslaw.com>; Elise A. Lindsley <elindsley@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>; Lauren E. Muhr

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Subject: Re: Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

8/21 before 2pm or 8/22 before 12pm works on my end.

Also please add Andrea Checkai, copied above, to your service list on this matter.

Sincerely,

Molly E. Boekeloo

Borkan & Scahill, Ltd.
Two First National Plaza
20 South Clark Street
Suite 1700
Chicago, Illinois 60603
Tel: 312-580-1030
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mboekeloo@borkanscahill.com

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From: Renee Spence <spence@loevy.com>
Sent: Thursday, August 15, 2024 11:46 AM
To: Maurice C. Hunt <mhunt@jsotoslaw.com>

Cc: agrill@rfclaw.com <agrill@rfclaw.com>; Austin Rahe <arahe@rfclaw.com>; Catherine M. Barber <cbarber@rfclaw.com>; Eileen E. Rosen <erosen@rfclaw.com>; Jessica Zehner <jzehner@rfclaw.com>; lferrise@rfclaw.com <lferrise@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Elva Lopez <elopez@rfclaw.com>; Kara Hutson <khutson@rfclaw.com>; Jim Sotos <JSotos@jsotoslaw.com>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Elizabeth R. Fleming <efleming@jsotoslaw.com>; Elise A. Lindsley <elindsley@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>; Lauren E. Muhr <LMuhr@jsotoslaw.com>; Rachael L. H. Letten <rletten@jsotoslaw.com>; Tonet Ballard <TBallard@jsotoslaw.com>; Valerie Stubbe <VStubbe@jsotoslaw.com>; Graham Miller <[gmiller@borkanscahill.com](mailto:gmillar@borkanscahill.com)>; Misha Itchhaporia <mitchhaporia@borkanscahill.com>; Molly Boekeloo <mboekeloo@borkanscahill.com>; Steven Borkan <sborkan@borkanscahill.com>; Tim Scahill <tscahill@borkanscahill.com>; Whitney Hutchinson <whutchinson@borkanscahill.com>; Emily Schnidt <eschnidt@borkanscahill.com>; Elena Favela <elena@borkanscahill.com>; Liana Favela <kmercado@borkanscahill.com>; Wendy Chasteen <wendy@borkanscahill.com>; Kellie Voss <kellie@kmltdlaw.com>; Christiane Murray <cmurray@borkanscahill.com>; KELLI HUNTSMAN <kelli.huntsman@cookcountysao.org>; Bill Oberts <wboberts@obertsgalasso.com>; Kevin Kirk <kckirk@obertsgalasso.com>; ashley@bonjeanlaw.com <ashley@bonjeanlaw.com>; jennifer@bonjeanlaw.com <jennifer@bonjeanlaw.com>; Haley Coolbaugh <haley@bonjeanlaw.com>; gabriella@bonjeanlaw.com <gabriella@bonjeanlaw.com>; Steve Art <Steve@loevy.com>; Anand Swaminathan <anand@loevy.com>; Alyssa Martinez <alyssa@loevy.com>; Nkemjika Emenike <Emenike@loevy.com>; Marc Motter <motter@loevy.com>; Lily Dunkin <dunkin@loevy.com>
Subject: Re: Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

Thanks, Maurice.

Kevin, Molly, and counsel for the City, please let us know if Maurice's dates work for you.

Thanks,

Spence

R.

Spence (She/Her)

Error! Filename not specified.

Office: (312)

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311

N Aberdeen St, Chicago, IL 60607

www.loevy.com

On Thu, Aug 15, 2024 at 12:37 PM Maurice C. Hunt <mhunt@jsotoslaw.com> wrote:

Counsel,

I do not believe Defendants said they wanted to meet this week, rather Defendants requested dates to confer. There are several people who are out of the office tomorrow. Defendants are available to confer next week on the 8/20, 8/21, or 8/22 after 10:00am CST.

Maurice Hunt

From: Renee Spence <spence@loevy.com>

Sent: Thursday, August 15, 2024 11:26 AM

To: agrill@rfclaw.com; Austin Rahe <arahe@rfclaw.com>; Catherine M. Barber <cbarber@rfclaw.com>; Eileen E. Rosen <erosen@rfclaw.com>; Jessica Zehner <jzehner@rfclaw.com>; Iferrise <lferrise@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Elva Lopez <elopez@rfclaw.com>; Kara Hutson <khutson@rfclaw.com>; Jim Sotos <JSotos@jsotoslaw.com>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Maurice C. Hunt <mhunt@jsotoslaw.com>; Elizabeth R. Fleming <efleming@jsotoslaw.com>; Elise A. Lindsley <elindsley@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>; Lauren E. Muhr <LMuhr@jsotoslaw.com>; Rachael L. H. Letten <rletten@jsotoslaw.com>; Tonet Ballard <TBallard@jsotoslaw.com>; Valerie Stubbe <VStubbe@jsotoslaw.com>; gmilller@borkanscahill.com; mitchhaporla@borkanscahill.com; mboekeloo@borkanscahill.com; sborkan@borkanscahill.com; tscahill@borkanscahill.com; whutchinson@borkanscahill.com; eschnidt@borkanscahill.com; elena@borkanscahill.com; Liana Favela <kmercado@borkanscahill.com>; Wendy Chasteen <wendy@borkanscahill.com>; kellie@kmltldlaw.com; Christiane Murray <cmurray@borkanscahill.com>; KELLI HUNTSMAN <kelli.huntsman@cookcountysao.org>; Bill Oberts <wboberts@obertsgalasso.com>; Kevin Kirk <ckkirk@obertsgalasso.com>; ashley@bonjeanlaw.com; jennifer@bonjeanlaw.com; Haley Coolbaugh <haley@bonjeanlaw.com>; gabriella@bonjeanlaw.com

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Subject: Re: Abrego v. Guevara - Plaintiff's 37.2 Responses and Proposed Conference Time and Topics

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Counsel,

Defendants stated they wanted to meet this week. We are free tomorrow after 10am CT. Please let us know when you are available.

Thanks,

Spence

R. Spence (She/Her)

Error! Filename not specified.

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On Wed, Aug 14, 2024 at 12:05 PM Renee Spence <spence@loevy.com> wrote:

Dear Counsel,

Attached our Plaintiff's responses to Defendants' Rule 37 letters. We are available Friday midday to confer. Please let us know what works for Defendants.

In addition to the issues set out in these letters and the upcoming joint status report, Plaintiff asks Defendants to be prepared to discuss the following pending discovery items on our conference:

- Edits to Plaintiff's proposed ESI protocol
- Defendants' position on third-party civilian depositions
- Deposition dates for third party officers
- Deposition dates for the individual Defendants
- The City's production of documents, including:
 - Documents relating to the administration of polygraph examinations during the Garcia murder investigation
 - Maps, floor plans, and pictures of relevant areas of the CPD facilities
 - Documents related to third party witnesses (criminal investigations, IR jackets, conviction, etc.) disclosed in the parties' Rule 26(a)(1) disclosures
 - Indices and policies responsive to Requests Nos. 41 and 42 in our First Request for Production
- Defendants' responses to Interrogatories Nos. 10, 11, 14
- Individual Defendants' responses to the following discovery:
 - Response to Interrogatories Nos. 14 and 17
 - Defendant Turano's responses to Interrogatories Nos. 6, 9, 11, 15
 - Defendant Turano's responses to Plaintiff's Second Set of Interrogatories and Third Request for Production

It is our intent to resolve or reach an impasse on these issues during this conference so that the

parties can present arguments to the Court prior to the filing of the JSR.

Thanks,

Spence

R. Spence (She/Her)

Error! Filename not specified.

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